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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LOUIS A. CARDINALI, and all similarly  
situated individuals,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,  
INC.,

Defendant.

Case No. 2:16-cv-2046-JAD-NJK

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES**

**[First Request]**

Pursuant to LR 6-1 and LR 26-4, Plaintiff Louis A. Cardinali (“Plaintiff”) and Experian Information Solutions, Inc. (“Experian”), by and through their respective counsel of record, hereby stipulate and request that this Court extend the case deadlines in the above-captioned case one hundred and twenty (120) days. In support of this Stipulation, the parties state as follows:

**A. DISCOVERY COMPLETED TO DATE**

Presently, the active parties to this case are Plaintiff and Experian Information Solutions, Inc. (“Experian”), and as such, the recitation of discovery shall be with respect to Plaintiff and Experian.

1. Plaintiff filed his initial complaint on 8/29/2016. ECF Dkt. 1.
2. Experian answered the complaint on 10/3/2016. ECF Dkt. 16.
3. The Court entered its initial scheduling order on 12/9/2016. ECF Dkt. 31.
4. Plaintiff moved for leave to amend his Complaint on 1/3/2017. ECF Dkt. 34.
5. The Court entered its protective order on 1/4/2017. ECF Dkt. 35.
6. The Court granted Plaintiff’s motion for leave to amend his complaint on 4/19/2017. ECF Dkt. 56 (minutes).
7. Plaintiff filed his First Amended Complaint on 4/19/2017. ECF Dkt. 57.
8. Experian answered the First Amended Complaint on 4/28/17. ECF Dkt. 58.
9. The Court granted the parties’ stipulated Amended Scheduling Order on 10/13/2017. ECF Dkt. 67.
10. On October 25, 2017, Experian propounded its first set of Requests for Production of Documents, Requests for Admission, and Interrogatories on Plaintiff.
11. On November 9, 2017, Plaintiff propounded his first set of Requests for Production of Documents, Requests for Admission, and Interrogatories on Experian.
12. On November 23, 2017, Plaintiff responded to Experian’s first set of Requests for Production of Documents, Requests for Admission, and Interrogatories.
13. On December 11, 2017, Experian responded to Plaintiff’s first set of Requests for Production of Documents, Requests for Admission, and Interrogatories.

1 14. On December 12, 2017, Experian sent Plaintiff a 26-7 letter outlining various  
2 concerns about Experian's written discovery responses.

3 15. On December 28, 2017, Plaintiff sent Experian a 26-7 letter outlining various  
4 concerns about Experian's written discovery responses.

5 16. On January 8, 2017, the parties met and conferred for approximately four hours  
6 regarding their respective 26-7 letters, and reached numerous final and tentative  
7 agreements to supplement their requests.

8 **B. Specific Description of Discovery that Remains to be Completed**

9 1. Plaintiff and Experian's respective supplementation of their written discovery  
10 responses, pursuant to the January 8, 2017 meet-and-confer;

11 2. Depositions of Plaintiff and Experian's 30(b)(6) witness;

12 3. As applicable, disclosures of Plaintiff and Experian's experts and rebuttal experts;

13 4. As applicable, depositions of Plaintiff and Experian's experts and rebuttal experts;

14 5. Any additional necessary depositions; and

15 6. Any additional necessary written discovery.

16 **C. Reasons Why the Remaining Discovery Was Not Completed**

17 The parties aver, pursuant to LR 6-1, that good cause exists for the requested extensions.  
18 After Plaintiff filed his amended complaint, which contained new putative class allegations, Plaintiff  
19 propounded far-reaching and complex class-based discovery on Experian. During the parties'  
20 lengthy 26-7 conference on January 8, 2017, and in subsequent informal communications, the  
21 parties made and continue to make progress in attempting to structure class-wide discovery in a  
22 manner which is both adequate and cost-effective. Specifically, Experian has proposed initially  
23 limiting its inquiry into Plaintiff's class claims to a series of discrete internal update codes from its  
24 internal production which are related to Plaintiff's consumer dispute, and Plaintiff has expressed a  
25 willingness to agree to use any return from such an initial search sample in order to demonstrate that  
26 the Class is ascertainable and sufficiently numerous for certification purposes. Additional written  
27 discovery may be necessary to further define the scope of the Class from Experian's internal  
28

1 systems, which can be accomplished after Experian provides the results of its initial return.  
2 However, until such discovery is completed or reaches an impasse, disclosure of technical experts,  
3 the reports of such experts, and expert depositions is premature and will likely require  
4 supplementation and re-deposition. Instead, the parties agree that written discovery into Experian's  
5 internal systems and identification of the number of Class members should precede inquiry into  
6 expert-related matters. Therefore, granting the stipulation will facilitate the parties' good-faith  
7 discussions and provide sufficient time to complete this discovery while minimizing the necessity of  
8 seeking court involvement. Therefore, the parties also request that the Court extend the initial and  
9 rebuttal expert disclosure dates conterminous with the requested discovery extension.

10 For all of these reasons, the parties request that the Court grant this request for an extension  
11 of time.

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**D. Proposed Discovery Deadlines**

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
Close of Discovery	April 10, 2018	August 8, 2018
Deadline to Disclose Initial Experts	February 9, 2018	June 11, 2018 (58 days prior to the close of discovery) <sup>1</sup>
Deadline to Disclose Rebuttal Experts	March 13, 2018	July 11, 2018 (30 days after disclosure of initial experts)
Dispositive Motions	May 10, 2018	September 7, 2018 (30 days after the close of discovery)
Motion for Class Certification	May 10, 2018	September 7, 2018 (30 days after the close of discovery)
Pre-Trial Order	June 8, 2018	October 8, 2018 (31 days after the dispositive motion deadline) <sup>2</sup>

Dated this 16th day of January 2018.

/s/ Miles N. Clark

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**ORDER**

**IT IS SO ORDERED**

Dated: January 16, 2018

  
UNITED STATES MAGISTRATE JUDGE

<sup>1</sup> June 9, 2018 is a Saturday.

<sup>2</sup> October 7, 2018 is a Sunday.